

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

VERONICA GRAGE,

Plaintiff,

v.

NORTHERN STATES POWER CO. –
MINNESOTA,

Defendant.

Civil No. 12-2590 (JRT/JSM)

**DECLARATION OF
MATTHEW H. MORGAN**

I, Matthew H. Morgan, hereby declare:

1. I am a partner with the law firm of Nichols Kaster, PLLP, and am one of the attorneys representing Plaintiff in the above-captioned action.

2. I am over 18 years of age and am competent to testify about the matters contained in this declaration.

3. I am an attorney in good standing with the State Bar of Minnesota.

4. I make this declaration in support of Plaintiff's Motion for Partial Summary Judgment.

5. The parties engaged in private mediation on June 25, 2013. At mediation, the parties were able to tentatively settle Plaintiff Rogers' claims, but were unable to resolve Plaintiff Grage's claims.

6. Attached hereto are true and correct copies of the following exhibits:

Exhibit 1: Supervisor I, Field Operations Job Description (filed under seal);

- Exhibit 2:** Work Order Package dated December 21, 2012 (filed under seal);
- Exhibit 3:** Plaintiff's First Amended 30(b)(6) Deposition Notice of Northern States Power Co., Minnesota dated February 27, 2013;
- Exhibit 4:** NSP Job Families Characteristics document (NKA0002470-NKA0002494);
- Exhibit 5:** Excerpts from the deposition transcript of Veronica Grae dated August 15, 2013;
- Exhibit 6:** Deposition transcript of Jeffrey Custer dated March 13, 2013;
- Exhibit 7:** Excerpts from the deposition transcript of Mollie Kelman dated March 19, 2013; and
- Exhibit 8:** Excerpts from the deposition transcript of Robert Chapman dated March 12, 2013.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 31, 2013

s/Matthew H. Morgan
Matthew H. Morgan